

EXHIBIT 24

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan
 Aaron Polster

The County of Cuyahoga v. Purdue
Pharma, L.P., et al.
Case No. 17-OP-45005

City of Cleveland, Ohio vs. Purdue
Pharma, L.P., et al.
Case No. 18-OP-45132

The County of Summit, Ohio,
et al. v. Purdue Pharma, L.P.,
et al.
Case No. 18-OP-45090

Videotaped 30(b)(6) Deposition of the

Drug Enforcement Administration

through the testimony of Stacy Harper-Avilla

Washington, D.C.

April 11, 2019

9:16 a.m.

Reported by: Bonnie L. Russo

Job No. 3282688

1 Unit No. 3. The time is 1:07.

2 You may proceed, Counsel.

3 BY MR. O'CONNOR:

4 Q. Welcome back.

5 A. Thank you.

6 MR. O'CONNOR: I'm going to mark two
7 documents here as Exhibits 7 and 8.

8 (Deposition Exhibit 7 was marked for
9 identification.)

10 (Deposition Exhibit 8 was marked for
11 identification.)

12 BY MR. O'CONNOR:

13 Q. These are documents that appeared on
14 DEA's website.

15 A. Okay.

16 MR. CHANDLER: Just so we are clear,
17 Document 7 is the one updated January 13, 2010;
18 is that right?

19 MR. O'CONNOR: That's correct.

20 MR. CHANDLER: And 8 is the January
21 22nd.

22 MR. O'CONNOR: That's right.

23 BY MR. O'CONNOR:

24 Q. Starting with No. 7, which reflects
25 the aggregate production quota history for

1 selective substances between 2000 and 2010.

2 Do you see that?

3 A. Yes.

4 Q. Do you recognize this chart?

5 A. I recognize the format of the chart,
6 yes.

7 Q. Do you agree that it reflects the
8 aggregate production quota history for the
9 substances listed here on the left?

10 MR. ELSNER: Objection.

11 THE WITNESS: With the exception of
12 2010, it reflects the aggregate production
13 quota as finalized from 2000 to 2009.

14 BY MR. O'CONNOR:

15 Q. Okay. And with respect to 2010,
16 what does it reflect?

17 A. It would reflect the established.

18 Q. And is it fair to state the
19 established quota might change over the course
20 of the year?

21 A. Correct.

22 Q. Let's look at No. 8, Exhibit 8.

23 A. Yes.

24 Q. And do you agree that this reflects
25 the aggregate production quota history for the

1 substances listed on the left between the years
2 2009 through at least 2018?

3 A. The final aggregate production
4 quota, yes.

5 Q. And I want to direct your attention
6 on Exhibit 7 to the lines that say: "Oxycodone
7 (sale) and oxycodone (CONV)."

8 What does oxycodone (sale) mean?

9 A. That that is the aggregate
10 production quota set for oxycodone that will go
11 to dosage form manufacturers.

12 Q. Okay. And what does oxycodone
13 (CONV) mean?

14 A. So CONV stands for conversion and
15 that is the amount of oxycodone that will be
16 converted to a different substance.

17 Q. And you agree that the numbers
18 listed to the right of oxycodone (sale) reflect
19 the final aggregate production quota for the
20 years listed in the column headings?

21 MR. CHANDLER: Objection.
22 Mischaracterizes prior testimony.

23 THE WITNESS: For 2000 through 2009,
24 yes.

25 BY MR. O'CONNOR:

1 Q. Okay. So just to make sure I am
2 reading this correctly, if we look in the
3 column 2008, the number is for oxycodone (sale)
4 70,000.

5 What does that 70,000 represent?

6 A. That 70,000 represents the DEA's
7 estimated final number of the amount of
8 oxycodone for sale that may be required to
9 fulfill legitimate, scientific, medical,
10 research, industrial needs, export as well as
11 inventory requirements.

12 Q. Okay. And in coming to that number,
13 did DEA take into account the factors that it
14 was required to consider under the Controlled
15 Substances Act?

16 MR. ELSNER: Objection.

17 THE WITNESS: Yes.

18 BY MR. O'CONNOR:

19 Q. And in coming to that number, did
20 DEA consider the factors it was required to
21 under the regulation related to aggregate
22 production quota?

23 A. Yes.

24 Q. And with respect to the numbers
25 listed for the other substances here, did the